# Departments

PRESERVATION RESOURCES POINT OF VIEW NATIONAL CENTER STATE NEWS

## POINT OF VIEW

Draft Standards for Furnished Historic Interiors

Dear Editor:

Publication in CRM, Volume 18, No. 10, of the Mid-Atlantic Association of Museums' (MAAM) draft standards for the treatment of furnished historic interiors using "as a model" The Secretary of the Interior's Standards for the Treatment of Historic Properties, raises important issues and concerns. The Secretary's Standards were codified July 12, 1995, in the Federal Register as 36 CFR 68. The Standards for Preservation, Rehabilitation, Restoration, and Reconstruction are requirements for the recipients of Historic Preservation Fund grants-in-aid, but may also be used by anyone planning treatment on a National Register property (buildings, structures, sites, objects, and districts).

The Heritage Preservation Services Program, Washington, DC (formerly Preservation Assistance Division) is responsible for the development, interpretation, enforcement, and, when necessary, revision of 36 CFR 68 as well as 36 CFR 67 (Standards for Rehabilitation). The following comments are offered within the context of MAAM's request for NPS support of another set of standards specifically for furnished historic interiors.

## 1. "Spin-off" of a Federal Regulation

The National Park Service has always been supportive of the

broad use of its professional Standards for treating historic places. The draft standards for furnished interiors create a problem, however, because they re-interpret the content of the existing regulation, while bearing striking similarity in format as well as language and numbering. In this regard, what may have begun as a statement of professional agreement, is, in the end, a critique of the model. It serves to confuse the recently published federal regulation and, thus, undermine its intent as "umbrella" for treating all property types.

#### 2. Proliferation of Standards

In The Secretary of the Interior's Standards for the Treatment of Historic Properties, all property types listed in the National Register are called "the property" or "properties." Further, since interiors are components of buildings (or buildings in districts), they are subsumed within the property type, "building." Furnishings, if they were addressed, would then be a sub-set of interiors within the broader context of buildings. The Standards were revised in 1992 to be applicable to a broad range of property types, while guidelines would interpret specific examples of property types. Furnished historic interiors address a level of specificity not addressed in the Secretary's Standards.

The reason umbrella treatment Standards were developed was precisely to avoid the proliferation of mini-standards for parts of resources. The assumption is that treatment of any historic resource follows an agreed upon course of action, and is weighed in merit

using as an ideal the notion of "least intervention possible."

## 3. Alteration of the Hierarchy for Treatment

To the extent that the draft standards alter the meaning of the existing codified Standards, they demonstrate to me that the wrong model was selected. The most notable difference is that the acknowledged hierarchy (set up as early as the 1970s in the first Standards) has been re-arranged. The hierarchy for treatment clearly established in The Secretary of the Interior's Standards for the Treatment of Historic Properties reflects levels of intervention, from the least to the greatest. While Preservation is the first, most favored treatment in the regulation and the draft furnished interior standards, the other three treatments go against widely accepted principles for treatment. Rehabilitation, not Restoration, is the second treatment in the hierarchy because it accepts the continuum of history rather than acknowledging backdating. The draft standards put Reconstruction before Rehabilitation as a preferred treatment. Treatment of museum collections, and the interpretive ramifications, would thus seem to have different goals and priorities.

## 4. Reinstatement of General Standards

Much of the updating of the earlier Secretary of the Interior's Standards for the Treatment of Historic Properties was to acknowledge that General Standards governing very different treatment philosophies (Preservation, Rehabilitation, Restoration, and Recon-

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struction) was illogical; for example, if changes over time show evidence of development in Preservation and Rehabilitation, they absolutely do not in Restoration. Restoration removes the evidence of all but the most significant time—it does not acknowledge the continuum.

The general standards for historic interior furnishings, thus, deny two of four treatments in the Specific Standards—Restoration and Reconstruction. To the extent that the general standards for furnished interiors convey the notion of preservation or conservation, they function as a single, consistent philosophy in and of themselves. But to follow with specific standards for four treatments that deny principles in the General Standards is to reinstate the illogical.

In summary, statements of principle for the treatment and interpretation of historic interiors and their furnishings most certainly need to be addressed. Development of guidelines or other guidance materials using the existing regulation, 36 CFR 68, as umbrella treatment Standards would be the preferred course of action. But modifyre-arranging, and inadvertently re-interpreting the model can only lead to confusion. Finally, the sum total of differences between the published regulation and the draft standards for furnished historic interiors demonstrates more differences than similarities in the decisionmaking process. All of these points suggest the need for further discussion before creating more standards, rather than interpretive guidelines.

> —Kay D. Weeks Heritage Preservation Services Washington, DC

Perceptions of Preservation

Dear Editor:

I enjoyed reading the article by Leland M. Roth, "Living Architecture: Differing Native and Anglo Perceptions of Preservation" in CRM Vol. 18, No. 5. I was intrigued by his views on Sgan Gwaii, a.k.a Ninstints World Heritage Site, which is part of Gwaii Haanas National Park Reserve and a Haida heritage site. As a Parks Canada cultural heritage type I have been closely involved with planning the conservation of the site. This has meant consulting with agency officials, Haida representatives and conservation specialists. While the consensus seems to be to let the monumental poles die a natural death, there are some elaborations on this approach which may interest your readers.

In the 1970s the provincial museum, which was then interested in the site, found the poles to be suffering from the incursions of the forest and other vegetation. The seedlings from trees and salal bushes were rooting in the poles, grass and other vegetation were holding moisture, advancing deterioration, and fallen poles and house beams were quickly disappearing. The museum, guided by its then chief of conservation, Richard Beauchamps, took the view that although the poles could not be preserved indefinitely, their life could be prolonged by some simple measures and therefore proceeded to implement a program of conservation.

The objective of the conservation was to keep the poles standing as long as possible. A guiding principle was that there was to be no intrusive measures taken to prolong the life of the poles. No chemical preservatives were used. Instead, more natural remedies were employed. Damaging trees were removed from the

immediate vicinity, leaving a sufficient number to act as a wind break. Removing the trees brought increased sunlight and with it ultraviolet rays which destroyed many of mosses and lichens that grew

on the poles. Soil and organic material from around the bases were removed and replaced with inert beach gravel. Perhaps the most intrusive element was the supporting of a memorial pole with a bridge rail. The maintenance procedures established by the museum were continued by the site's Haida watchman, Captain Gold. Saplings continued to be removed, the pathways hardened with stones, and a watch kept on the lean of the poles.

As a result of a 1987 agreement between the provincial and federal government, the area was set aside as a federal reserve. A subsequent agreement between the Canadian government and the Council of the Haida Nation provided for the co-management of the area. Throughout both the provincial and federal eras, however, the Haida have remained interested in the area and appointed watchmen to look after important cultural sites. Captain Gold is the watchman at Sgan Gwaii. Last year Captain Gold advised us of two issues affecting the conservation of the site. At least four of the poles were leaning over to the extent that they were in danger of falling. And he wanted a more formal guide for brushing the site. Just where should the forest end and the grassy area around the poles begin?

I was given the task of coming up with a plan. Last summer, we gave a contract to Richard Beauchamps, now a consultant, to visit the site with two Haida elders. Richard proposed some emergency work to straighten four

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Mortuary poles with temporary bracing,Sean Gwaii, Gwaii Haanas, Queen Charlotte Islands, B.C. Canada,January, 1995. poles before implementing a more comprehensive conservation plan. Although the Haida elders wanted no obvious intrusions, they wanted to keep it "looking nice" and agreed with the proposal of Richard and Captain Gold to straighten the poles. Subsequent visits by resource managers, archeologists, landscape architects, and other interested individuals supported this plan and in September we hope to initiate a two-week project to excavate and re-erect four poles (three mortuary and one memorial). While this is going on we hope to come up with a more comprehensive conservation plan which will go to the Archipelago Management Board for approval. The AMB is the joint Parks Canada/ Haida body that is responsible for Gwaii Haanas. The planning is focusing on maintaining the poles, controlling vegetation and lessening the impact of visitation. As well it will have to accommodate visitor amenities such as mooring, toilets and trails in as unobtrusive a manner as possible. The big debate right now is whether to have a shelter near the village.

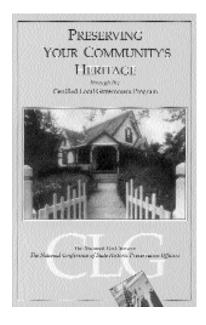
—James Taylor Historian, Parks Canada July 20, 1995

### LOCAL PROGRAMS

New CLG Publication Marks 1,000 CLGs and Administrative Changes

A new 16-page brochure, Preserving Your Community's Heritage Through the Certified Local Government Program, has been published by the National Park Service's Heritage Preservation Services Program in conjunction with the National Conference of State Historic Preservation Officers. Intended as the principal piece of program literature for the Certified Local Government Program, the handsomely illustrated publication explains the objec-

tives of the program and provides brief descriptions of over 30 CLG grant-supported projects carried out in communities all over the country. The release of the new publication marks the 10th anniversary of the initial certification of localities under the program and the fact that there are now 1,000 participating CLGs. To the earliest group of five Georgia communities certified by the Georgia SHPO and approved by the



National Park Service in 1985, have been added cities, towns, boroughs, and counties in all 50 states.

The array of projects depicted in the new brochure manifests the CLG program's diversity both in terms of activities and types of communities. Born 15 years ago of a mistrust by urban mayors of the National Register nomination process and their lack of an official voice in it, the CLG program has emerged as an ideal federal-state-local partnership. Not only have the State Historic Preservation Offices always had a strong hand in shaping their own CLG program to the particular characteristics of the state but, most importantly, the program has delivered dollars (however small) to the locals: it remains the sole source of federal funding devoted exclusively to local historic preservation activities and, among many SHPOs, the only Historic Preservation Fund subgrants made. While focusing on the products of CLG grants as the most readily visible results of the program in the selected communities, the new publication highlights, as well, other important CLG accomplishments and benefits: building on local initiative; supporting the transformation of local preservation groups from grass-roots advocates to policy makers; integrating local preservation activities into local government, especially land use planning; a focus on a wide range of resource types including cultural landscapes, and archeology; and, innovative public education activities.

Issuance of the new publication also highlights the beginning of a new chapter in the administration of the CLG program as a result of both the reorganization of the National Park Service and the push to "reinvent and streamline" government programs (as outlined by the Historic Preservation Performance Review Committee in its report of March of 1994). Due to the Park Service reorganization, the CLG Program, formerly handled out of both the Washington Office and five regional offices, will now be administered exclusively in Washington. This change strengthens the role of the SHPOs in the CLG Program, but, as the production of the new brochure demonstrates, the National Park Service remains committed to upholding its position in this model partnership among three levels of government. Single copies of the publication, Preserving Your Community's Heritage Through the Certified Local Government Program, are available from the SHPO or from the National Park Service, Heritage Preservation Services Program, P.O. Box 37127, Stop 2255, Washington, DC 20013-7127.

-Stephen A. Morris

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